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9	Attorney for Plaintiff				
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11					
12	UNITED STATES DISTRICT COURT				
13	NORTHERN DISTRICT OF CALIFORNIA				
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15					
16	EDY BARRIOS,)	No. C07 02189		
17	Plaintiff,		JOINT MOTION TO CHANGE CA MANAGEMENT ORDER	SE	
18	v.)	WANAOLWENT ONDER		
19	JANPRO, INC., JOSE MENDOZA, and)			
20	DOES 1 to 50, inclusive.)			
21	Defendants.	_)			
22	Digintiff attorney James Del Bon and Defe	nga Attan	nov Alfred Buze appeared at a Casa		
23	Plaintiff attorney James Dal Bon and Defense Attorney Alfred Buzo appeared at a Case				
24	Management Conference on August 8, 2008 at 10:00am in which the Honorable Judge Jerem				
25	Fogel ordered the Defense counsel to appear with his client at a deposition on August 26, 200				
26	followed by a Case Settlement Conference before September 12, 2008.				
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1	The parties respectfully request that Judge Fogel modify his order as follows:		
2	1) The Defendant's deposition will occur on August 13, 2008 at 1:30pm at plaintiff's office		
3	28 North 1 st Street, Suite 210, San Jose, CA 95113.		
4	2)The case will be mediated before the Honorable Judge Alex Saldamando at ADR Serv		
5	at 50 Fremont Street Suite 2110, San Francisco, California 94105 Tel (415) 772-090		
6	3) The Defense counsel will be held to the same sanctions if he does not appear with his		
7	client at the modified times.		
8	Parties assert that the following good cause exists to request a modification of the order:		
9	1) Honorable Magistra	te Judge Seeborg is extremely busy and may not be able to fit	
10	the case managem	nent conference into his schedule before September 12, 2008.	
11	The Parties do not	t wish to burden the federal courts if they can resolve this case	
12	through private me	ediation.	
13	2) The parties have alre	eady cleared the modified dates with their clients and defense	
14	counsel has shown	n a good faith effort by working with Plaintiff's counsel for	
15	approximately two	o hours following the August 8, 2008 Case Management	
16	Conference to prepare these stipulations and ensure that he and is client will		
17	comply.		
18		Respectfully Submitted,	
19		BUZO LAW OFFICES	
20		BOZO LAW OFFICES	
21		By: <u>s/Alfred Buzo</u> ALFRED R. BUZO	
22		Attorney for Defendants	
23	Dated: August 8, 2008	LAW OFFICES OF JAMES DAL BON	
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25		By:s/jdb	
26		JAMES DAL BON Attorney for Plaintiff	
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